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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LATESHA WATSON,

Plaintiff,

v.

CITY OF HENDERSON; BRISTOL
ELLINGTON; KEVIN ABERNATHY;
KENNETH KERBY; DEBRA MARCH;
RICHARD DERRICK; RICHARD
MCCANN; NICK VASKOV; KRISTINA
GILMORE; DOES I through X, inclusive,

Defendants.

Case No.: 2:20-cv-01761-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS KEVIN
ABERNATHY, RICHARD MCCANN
AND KENNETH KERBY'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT
AND MOTION TO DISMISS AND
STRIKE PLAINTIFF'S REQUEST FOR
PUNITIVE DAMAGES;
DEFENDANTS NICHOLAS VASKOV
AND KRISTINA ESCAMILLA
GILMORE'S SPECIAL MOTION TO
DISMISS PURSUANT TO NRS 41.660;
AND DEFENDANTS CITY OF
HENDERSON, DEBRA MARCH,
RICHARD DERRICK, BRISTOL
ELLINGTON NICHOLAS VASKOV
AND KRISTINA ESCAMILLA
GILMORE'S MOTION TO DISMISS
COMPLAINT**

(FIRST REQUEST)

(ECF 33, 35, 36)

Plaintiff, LaTasha Watson ("Watson") by and through counsel of record, Marc P. Cook, Esq.
of the law firm of COOK & KELESIS, LTD.; Defendants, Kevin Abernathy, Richard McCann and
Kenneth Kerby, by and through counsel of record, Nicholas M. Wieczorek, Esq. of the law firm of
CLARK HILL PLLC; and Defendants City of Henderson, Debra March, Richard Derrick, Bristol

1 Ellington, Nicholas Vaskov and Kristina Escamilla Gilmore, by and through counsel of record,
2 Patrick G. Byrne, Esq. of the law firm of SNELL & WILMER LLP, hereby stipulate to extend the
3 deadline for Plaintiff to respond to the Motions to Dismiss filed by Defendants [ECF 33, 35, 36] to
4 February 16, 2021:

- 5 1. Defendants have filed three (3) motions which seek dismissal of all claims against
6 them under a variety of arguments relying on various legal theories. Responses are
7 all due on January 1, 2021.
- 8 2. As the Defendants hold different positions with the City of Henderson and are
9 alleged to have engaged in separate conduct related to Plaintiff's claims, Plaintiff
10 needs additional time to analyze the reasoning set forth in the motions and prepare
11 responses addressing the arguments raised by Defendants.
- 12 3. Counsel for all parties have agreed to a 45 day extension for Plaintiff to respond to
13 the Motions to Dismiss.
- 14 4. The extensions are sought in good faith and not for the purpose of delay.
- 15 5. Pursuant to the parties' stipulation, Plaintiff's responses to the Motions to Dismiss
16 will now be due on or before February 16, 2021.

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18 DATED this 24th day of December, 2020.

DATED this 24th day of December, 2020.

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20 COOK & KELESIS, LTD.

CLARK HILL PLLC

21 By: /s/ Marc P. Cook
22 MARC P. COOK, ESQ.
23 Nevada Bar No. 004574
24 JULIE L. SANPEI, ESQ.
25 Nevada Bar No. 005479
26 517 South Ninth Street
27 Las Vegas, Nevada 89101
28 *Attorneys for Plaintiff, Latesha Watson*

By: /s/ Nicholas M. Wieczorek
NICHOLAS M. WIECZOREK, ESQ.
Nevada Bar No. 006170
3800 Howard Hughes Parkway, Suite 500
Las Vegas, Nevada 89169
*Attorney for Defendants Kevin Abernathy,
Richard McCann and Kenneth Kerby*

1 DATED this 24th day of December, 2020.

2 By: /s/ Patrick G. Byrne

3 PATRICK G. BYRNE, ESQ.

Nevada Bar No. 007636

4 RICHARD C. GORDON, ESQ.

Nevada Bar No. 009036

5 PAUL SWENSON PRIOR, ESQ.

Nevada Bar No. 009324

6 THERESA L. GUERRA, ESQ.

Nevada Bar No. 015235

7 3883 Howard Hughes Parkway, Suite 1100

Las Vegas, Nevada 89169

8 *Defendants City of Henderson, Debra March,*

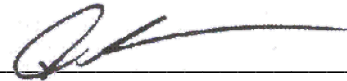
Richard Derrick, Bristol Ellington, Nicholas

9 *Vaskov and Kristina Escamilla Gilmore*

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11 **ORDER**

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13 IT IS SO ORDERED:

14 Dated: December 28, 2020

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17 ANDREW P. GORDON
18 UNITED STATES DISTRICT JUDGE
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